

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ROBERT MELOCK,	)	Case No. 1:24-cv-12679
	)	
Plaintiff,	)	
	)	Hon. Judge Sunil R. Harjani
v.	)	Mag. Judge Young B. Kim
	)	
CITY OF WAUKEGAN, et al.,	)	
	)	
Defendants.	)	JURY TRIAL DEMANDED

**PARTIES' JOINT STATUS REPORT**

Now come the Parties in the above-captioned case and provide the following joint status report pursuant to the Court's July 30, 2025 Minute Order. Dkt. 80.

**1. Discovery Update:**

**a. Written Discovery –**

The Parties have exchanged their initial disclosures, written discovery, and responses, along with thousands of pages of documents. The Parties have also conferred about the adequacy of the written discovery responses as ordered by the Court. Dkt. 80. As a result of that conferral, the parties have not identified any discovery issues at this time that they cannot resolve without the involvement of the Court.

The Parties, at their conferral, agreed to supplement some written discovery responses as requested by the Parties and to obtain and produce confidential or private documents under the recently entered Confidentiality and HIPAA Orders as soon as practical. Plaintiff, for example, has agreed to gather and obtain medical records sufficient to show the extent of (and treatment of) certain injuries he attributes to the misconduct alleged in his complaint. And the Defendants have agreed to gather and produce relevant insurance policies under Rule 26(a)(1)(A)(iv). Further, the

City of Waukegan Defendants have agreed to gather and produce relevant Personnel files, City of Waukegan policies, and records subpoenaed from the Attorney General.

There are also some outstanding discovery responses owed to Plaintiff by the City of Waukegan and Defendant Donald Meadie which have not yet been produced due to a medical emergency faced by Defendant Meadie. Counsel for Waukegan anticipates producing such responses to Plaintiff by this Friday, September 5.

**b. ESI Protocol –**

In exchanging documents, the Parties have not encountered issues in producing ESI.

Date: September 2, 2025

Respectfully Submitted,

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*Counsel for Plaintiff*

s/ Ahmed A. Kosoko  
*Counsel for Waukegan Defendants*

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